

1 **JACKIE L. ROBINSON**

2 **IN PRO PER**

3 2300 W. Sahara Blvd.

4 Suite 800

5 Las Vegas, NV 89102

6 [jackierob@embarqmail.com](mailto:jackierob@embarqmail.com)

7 T: (702) 856-4440

8 *for Defendants:*

9 JACKIE ROBINSON, an individual, ALL  
10 NET, LLC, a Nevada Limited Liability  
11 Company; DRIBBLE DUNK, LLC, a  
12 Nevada Limited Liability Company

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 TACSIS APC, a California corporation.  
16 and KENT LIMSON, an individual,

17 Plaintiffs

18 v.

19 JACKIE ROBINSON, an individual; ALL  
20 NET LAND DEVELOPMENT, LLC, a  
21 Nevada Limited Liability Company; ALL  
22 NET, LLC, a Nevada Limited Liability  
23 Company; DRIBBLE DUNK, LLC, a  
24 Nevada Limited Liability Company; AGS  
ASSURETY, LLC, a Nevada Limited  
Liability Company; TIMOTHY J.  
ARELLANO, an individual; DAVID  
LOWDEN, an individual; MESSNER  
REEVES LLP, a Colorado Limited  
Liability Partnership; TORBEN WELCH,  
an individual; LORING JACOBS, an  
individual, and DOES 1 THROUGH 100  
INCLUSIVE,

25 **CASE NO.: 2:2024-cv-02284**

26 **MOTION FOR CONTINUANCE**

27 **DEFENDANTS.**

1 COMES NOW DEFENDANTS JACKIE ROBINSON, ALL NET LAND DEVELOPMENT,  
2 LLC, ALL NET, LLC, AND DRIBBLE DUNK, LLC (COLLECTIVELY “DEFENDANTS”)  
3 AND HEREBY MOVE THIS COURT FOR A CONTINUANCE OF THIRTY (30) DAYS OF  
4 ALL CURRENT DEADLINES IN THIS CASE, PURSUANT TO RULE 6(B)(1) OF THE  
5 FEDERAL RULES OF CIVIL PROCEDURE, AND IN SUPPORT THEREOF STATE AS  
6 FOLLOWS:

8

- 9     1. **Counsel Retention:** Defendants are in the process of retaining Gary S. Lincenberg of  
10         Bird, Marella, Rhow, Lincenberg, Drooks & Nessim, LLP, located at 1875 Century Park  
11         East, 23rd Floor, Los Angeles, California 90067-2561, as their legal counsel. Mr.  
12         Lincenberg’s contact details are as follows: phone (310) 201-2100, email  
13         glincenberg@birdmarella.com, website www.birdmarella.com.
- 14     2. **Circumstances Necessitating Continuance:** Defendants are attempting to retain Mr.  
15         Lincenberg and Mr. Bird of Bird Marella. Both Mr. Lincenberg and Mr. Bird suffered  
16         losses in the Palisades fire. So, Defendants are requesting additional time.
- 17     3. **Good Cause for Continuance:** Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure  
18         provides that a court may, for good cause, extend deadlines if a request is made before  
19         the expiration of the original deadline.
- 20     4. **Equity and Justice Favor the Granting of This Motion:** A continuance will not  
21         prejudice the Plaintiffs or the progression of this case. Instead, it will ensure that  
22         Defendants’ newly retained counsel can adequately prepare, review the case materials,  
23         and address this matter thoroughly.

1       5. **Requested Relief:** In light of the extraordinary circumstances and the principles of  
2       fairness and equity, Defendants respectfully request a 30-day continuance of all current  
3       deadlines in this case, including but not limited to deadlines for filing responsive  
4       pleadings, discovery deadlines, and any scheduled hearings.

5       6. **Proposed Order:** A proposed order granting this motion is attached hereto as Exhibit A  
6       for the Court's convenience.

8       WHEREFORE, Defendants respectfully request that this Court grant their motion and extend all  
9       deadlines by thirty (30) days to allow Defendants' counsel adequate time to recover and prepare.

11      Respectfully submitted this January 21st, 2025.

13      **Defendants, acting In Pro Per**

15      By: *Jackie L. Robinson*  
16      **Jackie L. Robinson**

17      **Individually and as Representative of All Net, LLC,**

18      **and Dribble Dunk, LLC**

19      CERTIFICATE OF SERVICE I hereby certify that a true and correct copy of the foregoing  
20       motion was served on all counsel of record via the Court's CM/ECF system on this January 21st,  
21       2025.

24      By: *Jackie L. Robinson*

25      **Jackie L. Robinson, Individually and as Representative of All Net, LLC,**  
26      **and Dribble Dunk, LLC**